

**UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
Lucci Restaurant Group, LLC)	Chapter 11 Subchapter V
)	
Debtor)	Jointly Administered Case No.
)	22-03452
)	
)	Hon. David D. Cleary

In re:)	
)	Chapter 11 Subchapter V
Agim Arifi)	
)	Jointly Administered Case No.
Debtor)	22-03457
)	

In re:)	
)	Chapter 11 Subchapter V
Bashkim Arifi and Fatima Arifi)	
)	Jointly Administered Case No.
)	22-03458
)	

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on July 29, 2022, at 10:00 a.m., I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, and present the motion of the Debtors to appoint Accounts for the respective bankruptcy estates, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-8287666. Then enter the meeting ID and passcode.

Meeting ID and password. The meeting ID for this hearing is 161 122 6457 and the password is Cleary644. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Lucci Restaurant Group LLC
By: Richard N. Golding (ARDC 0992100)
The Golding Law Offices, P.C.
500 N. Dearborn Street, 2nd FL
Chicago, IL 60610
T: (312) 832-7892
rgolding@godinglaw.net

CERTIFICATE OF SERVICE

I, Richard N. Golding, declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 19, 2022, and to mail recipients on Jun 20, 2022, before 5:00 pm

/s/ Richard N. Golding

All parties entitled to Notice by CM/ECF upon the filing of the Motion:

and, By First Class Mail all those on the attached list.

The Huntington National Bank
c/o Dickinson Wright PLLC
55 W. Monroe, Suite 1200
Chicago, IL 60603-5127

3D Baking
4140 N Kolmar
Chicago, IL 60641-1918

AA Service Co.
550 Anthony Trail
Northbrook, IL 60062-2538

Allen Brothers
3737 S. Halsted
Chicago, IL 60609-1689

American Express
Credit Dept.
P.O. Box 96001
Los Angeles, CA 90096-8000

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Averus Fire Services
3851 Clearview Court
Gurnee, IL 60031-1247

Bashkim & Fatima Arifi
8729 W Stolting Road
Niles, IL 60714-1818

Bellissimo Distribution, LLC d/b/a Greco and
1550 Hecht Road
Bartlett, IL 60103-1697

Brekthru
P.O. Box 809190
Chicago, IL 60680-9190

Brew Smart
5410 Newport Drive, Suite 40
Rolling Meadows, IL 60008-3722

Cozzini
350 Howard Avenue
Des Plaines, IL 60018-1908

Deerfield VCI, LLC
PO Box 776758
Chicago, IL 60677-6758

Don & Co
2562 Payshere Circle
Chicago, IL 60674-0001

Greco & Sons
1550 Hecht Road
Bartlett, IL 60103-1697

Harrisons Poultry
1201 Waukegan Road
Glenview, IL 60025-3019

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101-7346

L.L. Packing
527 W 41st Strreet
Chicago, IL 60609-2708

Mickey's
4601 W Addison St
Chicago, IL 60641-3702

Momentum
1658 N Milwaukee
Suite 270
Chicago, IL 60647-6905

Ralph Weiner & Associates
720 Astor Lane
Des Plaines, IL 60019-0001

Small Business Association
2 North Street
Birmingham, AL 35203

Smithereen Pest Managment
7400 Melvina Ave
Niles, IL 60714-3908

Southern Glazer's
300 E CrossroadsPkwy
Bolingbrook, IL 60440-3516

Supreme Lobster
220 E. North Ave
Villa Park, IL 60181-1207

Sysco
250 Weiboldt Drive
Des Plaines, IL 60016-3192

The Hartford Insurance Co
P.O. Box 600916
Dallas, TX 75360

Three Sisters
P.O. Box #6
Kankakee, IL 60901-0006

Trimark
P.O. Box 8570
Carol Stream, IL 60197-8570

Visa Dept Store Nat Bank / Macy's
Attn: Bankruptcy
PO Box 8053
Mason, OH 45040-8053

Wintrust Mortg Div of Barrington Bk and Trus
Kurt M Carlson
Carlson Dash LLC
216 S Jefferson Street Ste 504
Chicago, IL 60661-5698

Matthew Brash
Newpoint Advisors Corporation
5600 N. River Road
Suite 800
Rosemont, IL 60018-5166

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

**THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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DEBTORS' APPLICATION FOR APPOINTMENT OF ACCOUNTANT

NOW COMES Lucci Restaurant Group LLC, an Illinois limited liability company, Debtor and Debtor-In-Possession ("Debtor"), on its application ("Application") to Appoint an Accountant, by and through their attorney, Richard N. Golding and The Golding Law Offices, P.C. and in support thereof state to the Court as follows:

I. BACKGROUND, JURISDICTION AND VENUE

1. On March 25, 2022, the Debtor filed its voluntary petition for relief under Subchapter V of Chapter 11 of Title 11, United States Code ("Code"). The Debtor has continued

to operate its businesses and manage its business affairs as Debtor-in-Possession pursuant to §1107, § 1108 and §1184 since that date.

2. No official committee of unsecured creditors has been appointed in these Chapter 11 cases.

3. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §1334 and General Rule 2.33 of the Local General Rules of the United States District Court for the Northern District of Illinois. This proceeding is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A) and (N). Venue is proper in this district pursuant to 28 U.S.C. §1408. The statutory predicates for the relief sought herein are §§ 327, 329 and 1107 of the Bankruptcy Code and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure.

II. REQUIREMENT FOR SERVICES AND QUALIFICATIONS

4. In the course of this case, the Debtor must have professional accounting assistance in preparation of tax returns, monthly operating reports, financial statements and other related accounting services required by the Debtors.

6. Debtors wish to retain the services of Anthony D. Louras, C.P.A. of Block Advisors ("Louras") as its accountants in these cases. Louras is a duly licensed and practicing Certified Public Accountant in the State of Illinois, is experienced accounting for the Debtor, and is very well qualified to perform tax accounting services for the Debtor in this case.

7. The Debtors desire to employ Louras for his services and their estimated charges for such services are as follows:

- (a) a flat rate of \$450.00 the preparation of the individual Debtor's annual tax returns;
- (b) additional services related to the same will be billed at our customary prevailing hourly rates of \$200.00 to \$350.00;

(c) Services to Lucci Restaurant Group, LLC as follows:

- (i) Services related to bi-weekly payroll;
- (ii) preparation of monthly sales tax returns;
- (iii) monthly accounting
- (iv) preparation of monthly financial statements and reports;
- (v) preparation of quarterly Payroll Tax Returns; and
- (vi) assistance as required in developing projections and valuations to be provided in the Debtor's Sub Chapter V Plans;
- (vii) the fees for items included in (i) through (v) are \$1,000.00 per month;
- (vii) the fees related to preparing and filing the 1120S forms with the IRS and the fees related to preparation and filing of IL 1120 ST for 2022 are \$1,200.00.
- (viii) Additional tax and audit work, if necessary, will be billed within the hourly rates stated above depending upon the individual's rates directly performing the services. Additional hourly service to be delivered by Louras, if necessary, will be billed at \$350.00 per hour. These terms are set forth in Exhibit A, attached hereto and made a part hereof. The Debtor proposes to pay the accountant from operating funds subject to final approval by the Court.

III. DISINTERESTEDNESS OF PROFESSIONALS

9. To the best of the knowledge, information and belief of the Debtor, the aforesaid accountant and his firm have no adverse connection with the Debtor, the creditors of this estate or any other party in interest or accountants or other professionals. Louras has a claim against

the Debtor for its last monthly pre-petition services, and to the extent as may be permitted by 11 U.S.C. §1195. Anthony D. Louras is not relative of, nor have been connected with any judge of the bankruptcy court for this district, nor the United States Trustee for this district, that would be prohibited by Rule 5002 of the Federal Rules of Bankruptcy Procedure.

WHEREFORE, the Debtor, Lucci Restaurant Group LLC, prays for the entry of an Order authorizing the employment of Anthony D. Louras, C.P.A. and Block Advisors for the purposes provided within this Application, and for any such further relief as this court deems just.

Respectfully submitted,

By: /s/ Richard N. Golding
Attorney for the Debtor

Richard N. Golding, Esq. (ARDC# 6299876)
THE GOLDING LAW OFFICES, PC
500 N. Dearborn Street, 2nd Floor
Chicago, IL 60654
Tel: (312) 832-7885
Fax: (312) 755-5720
Email: rgolding@goldinglaw.net

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**DECLARATION IN ACCORDANCE WITH
SECTION 327 OF THE BANKRUPTCY CODE AND
BANKRUPTCY RULE 2014**

STATE OF ILLINOIS)	
)	SS:
COUNTY OF COOK)	

Anthony D. Louras ("Affiant"), pursuant to 28 U.S.C. § 1746, hereby deposes and states,
under penalty of perjury, as follows:

1. I am a certified public accountant duly licensed to practice in the State of Illinois.
I am a Small Business Partner with Block Advisors.

2. I respectfully submit this Affidavit in connection with the application of the above-captioned Debtor and Debtor in possession (the "Debtor") to retain and employ myself and the professionals at Block Advisors as accountants for the Debtors.

3. I have personal knowledge of the matters set forth herein. If called upon to testify, I could testify competently to the facts contained herein.

4. I am not related, and, to the best of my knowledge, no other professional employed by Block Advisors is related to any judge of the United States Bankruptcy Court of the Northern District of Illinois, Eastern Division.

5. To the best of my knowledge, neither I, Anthony D. Louras, or Block Advisors, nor any of its employees hold or represent an interest adverse to the Debtor within the meaning of Bankruptcy Code §327(a).

6. To the best of my knowledge, I, Anthony D. Louras, and all of its employees are disinterested as that term is defined in Bankruptcy Code §101(14) and used in §327(a).

7. To the best of my knowledge, neither I, Anthony D. Louras, Block Advisors, nor any of its employees have any connection to the Debtor's creditors, the United States Trustee, the Subchapter V trustee or any person employed in the office of the United States Trustee, or any other party in interest or their respective attorneys or accountants, within the meaning of Fed. R. Bankr. P. 2014(a), except to the extent that officers or shareholders of the Debtor may be creditors of the Debtor.

8. To the extent that any such other connection to the Debtor's creditors, the United States Trustee, any person employed in the office of the United States Trustee, or any other party in interest or their respective attorneys or accountants, in addition to the connections listed in

Paragraph 7 above, is discovered during the pendency of this case, I will amend this Affidavit to disclose same to the Court.

9. The professional services that I, Anthony D. Louras and Block Advisors expects to render to the Debtor include, but shall not be limited to, the following:

Services to Lucci Restaurant Group, LLC in the administratively consolidated cases are as follows:

- (i) Services related to bi-weekly payroll;
- (ii) preparation of monthly sales tax returns;
- (iii) monthly accounting
- (iv) preparation of monthly financial statements and reports;
- (v) preparation of quarterly Payroll Tax Returns; and
- (vi) assistance as required in developing projections and valuations to be provided in the Debtor's Sub Chapter V Plans;
- (vii) the fees for items included in (i) through (v) are \$1,000.00 per month;
- (vii) the fees related to preparing and filing the 1120S forms with the IRS and the fees related to preparation and filing of IL 1120 ST for 2022 are \$1,200.00.
- (viii) Additional tax and audit work, if necessary, will be billed within the hourly rates stated above depending upon the individual's rates directly performing the services. Additional hourly service to be delivered by Louras, if necessary, will be billed at \$350.00 per hour. These terms are set forth in Exhibit A, attached hereto and made a part hereof. The Debtor proposes to

pay the accountant from operating funds subject to final approval by the Court.

10. Anthony D. Louras and Block Advisors intends to apply for compensation for professional services rendered in connection with this Subchapter V of Chapter 11 case subject to this Court's approval and in accordance with sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court and other procedures that may be fixed by this Court. Affiant requests to be compensated on an hourly basis, plus reimbursement of the actual and necessary expenses Block Advisors incurs in accordance with the ordinary and customary rates which are in effect on the date the services are rendered and the expenses are incurred and as provided above.

11. With respect to this case, Anthony D. Louras has advised the Debtors and has agreed that in this case as follows:

(a) Anthony D. Louras \$350.00 per hour

(b) associates and others \$200 to \$350.00 per hour

Other attorneys and paralegals will render services to the Debtor as needed.

The Debtors understand that the hourly rates set forth above are subject to periodic adjustments in the ordinary course of Block Advisors' business, as the market may require or due to other conditions.

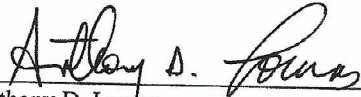
12. The hourly rates set forth above are Block Advisors' standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate Block Advisors for the work of its accountants and assistants and to cover fixed and routine overhead expenses.

13. Other than as have been agreed to between the Debtors and Affiant as set forth herein, there is no other proposed arrangement to compensate Affiant or Block Advisors. Affiant has not

shared, nor agreed to share (a) any compensation it has received or may receive with any other party or person, other than with the professionals of Block Advisors or (b) any compensation another person or party has received or may receive.

14. By reason of the foregoing, I believe I, as Affiant and Block Advisors is eligible for employment and retention by the Debtor pursuant to section 327(a) of the Bankruptcy Code and the applicable Bankruptcy Rules

Dated: June 15, 2022

/s/ 
Anthony D. Louras